

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WILLIAM JAMESON	:	CIVIL ACTION
	:	
v.	:	NO. 02-2802
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
ERNEST PEDATA	:	CIVIL ACTION
	:	
v.	:	NO. 02-2901
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
DAVID SORENSON	:	CIVIL ACTION
	:	
v.	:	NO. 02-3158
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
HAROLD WEINER	:	CIVIL ACTION
	:	
v.	:	NO. 02-3211
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
BRIAN SMITH	:	CIVIL ACTION
	:	
v.	:	NO. 02-3625
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	

KURT MEYLE	:	CIVIL ACTION
	:	
v.	:	NO. 02-3699
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
	:	
JEFFREY J. HYSLIP	:	CIVIL ACTION
	:	
v.	:	NO. 02-3768
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
	:	
SCOTT BURNSIDE	:	CIVIL ACTION
	:	
v.	:	NO. 02-3769
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
	:	
WILLIAM SPADA	:	CIVIL ACTION
	:	
v.	:	NO. 02-3858
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS,	:	
TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
	:	

**NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT  
AS LEAD PLAINTIFF AND FOR APPROVAL OF  
SELECTION OF LEAD AND LIAISON COUNSEL**

**PLEASE TAKE NOTICE** that class member International Brotherhood of Teamsters, Local 705 Pension Fund ( "Local 705"), by its counsel, will hereby move this Court on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the above-referenced actions; (ii) appointing Local 705 as Lead Plaintiff; (iii) approving Local 705's selection of the law firms of Milberg Weiss Bershad Hynes & Lerach LLP to serve as Lead Counsel and Law Offices Bernard M. Gross, P.C. to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Local 705 submits herewith a Memorandum of Law and the Declaration of Deborah R. Gross dated July 9, 2002.

Dated: July 9, 2002

Respectfully submitted,

**LAW OFFICES BERNARD M. GROSS, P.C.**  
**BY:**

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**Proposed Liaison Counsel**

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**Proposed Lead Counsel**